

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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PAN AMERICAN AIRWAYS, CORP.,

Plaintiff/Counterdefendant,

v.

Civil Action No.  
04-10515JLT

ROBERT E. BARNES,

Defendant/Counterplaintiff.

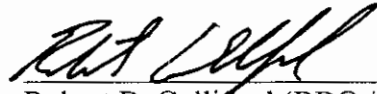
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**Plaintiff/Counterdefendant's  
Motion for Leave to Amend Complaint**

Pursuant to Rules 7(b) and 15(a) of the Federal Rules of Civil Procedure and Rule 7.1 of the Rules of this Court, plaintiff/counterdefendant Pan American Airways Corporation hereby moves for leave to amend its complaint filed herein against defendant/counterplaintiff Robert E. Barnes. The amended complaint is attached hereto.

Pursuant to Rule 7.1(A)(2) of the Rules of this Court, counsel hereby certifies that he has conferred with counsel for the defendant/counterplaintiff and he does not object to this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bob Culliford", written over a horizontal line.

Robert B. Culliford (BBO #638468)  
Pan American Airways, Corp.  
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Portsmouth, NH 03801  
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Corp.*

July 15, 2005

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